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December 20, 1999
PY-CEI/ OIE-0503L

Attention: James E. Dyer, Regional Administrator
United States Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Perry Nuclear Power Plant
Docket No. 50-440
Submission of Exercise Objectives

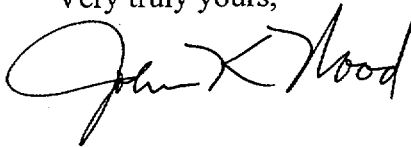
Gentlemen:

In keeping with the established schedule for submission of documents relating to an emergency preparedness exercise, enclosed are the proposed onsite objectives for the 2000 Perry Plant Evaluated Exercise on March 21, 2000.

Comments are requested by January 10, 2000 to enable the Perry Plant to meet the January 21, 2000 (60 day) date for submission of the exercise scenario and associated materials.

If you have any questions or require additional information, please contact Vernon K. Higaki, Supervisor – Emergency Planning Unit at (440) 280-5294.

Very truly yours,



VKH:ts

Enclosure

cc: NRC Project Manager
NRC Resident Inspector
NRC Document Control Desk
NRC Region III Emergency Preparedness Analyst

IE 35

PPR ADDN 05000440

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

PERRY NUCLEAR POWER PLANT

UNIT 1

ACKNOWLEDGEMENT OF RECEIPT

Title: Submission of proposed Objectives for the 2000 Perry Plant Evaluated Exercise
On March 21,2000

Letter Number: PY-CEI/OIE-0503L

Control Number: N/A

Letter Date: December 15,1999

Docket Number: 50-440

Signature

Date

Title

Return to:

Perry Nuclear Power Plant
Attn: Theresa Snider, A240
10 Center Road
Perry, Ohio 44081

2000 PERRY PLANT EVALUATED EXERCISE OBJECTIVES

The scope of the exercise is defined in Section 1.1. The exercise objectives for the Perry Plant are divided into separate objective categories. Objectives for the State of Ohio and Counties of Lake, Ashtabula and Geauga have been submitted by the responsible agencies through the Ohio Emergency Management Agencies (OEMA) for Federal Emergency Management Agency (FEMA) review.

SCOPE AND OBJECTIVES

1.1 SCOPE

The 2000 Emergency Preparedness Exercise, to be conducted during normal working hours as an announced exercise on March 21, 2000, will simulate accident events culminating in a radiological accident with resultant offsite releases from the Perry Plant, located in North Perry Village, Lake County, Ohio. The Exercise will involve events designed to test the effectiveness of the Perry Plant Emergency Preparedness Program and the integrated emergency response capabilities of the State of Ohio and the Counties of Lake, Geauga, and Ashtabula.

1.2 PERRY PLANT (ON-SITE) OBJECTIVES

The major objective of the exercise is to demonstrate the response capabilities of the Perry Plant Emergency Response Organization (ERO). Within this overall objective, individual objectives are specified below.

Acceptance criteria will be provided to exercise controllers to evaluate whether specific objectives have been adequately demonstrated. Questions regarding whether an objective has been satisfactorily met will be documented and assessed under PAP-1608, "Corrective Action Program," and the applicable remedial action(s) identified, if appropriate.

<u>AFFECTED AREA</u>	<u>ITEM NO.</u>	<u>OBJECTIVE</u>
Group A Objectives:		EVENT CLASSIFICATION
CR	A.1	Demonstrate ability to effectively assess postulated plant indications, alarms and reports, and correctly classify an emergency event in a timely manner.
CR, TSC EOF	A.2	Demonstrate ability to correctly identify a series of postulated emergency events which escalate to a Site Area or General Emergency classification.
EOF	A.3	Demonstrate ability to correctly terminate from the emergency phase.

Limiting Condition: A separate Recovery Director and Plant Recovery Manager will be mobilized in support of Recovery planning. TSC and EOF staffing used to support Emergency Phase response will establish the framework of a Recovery Organization as outlined in EPI-A10.

Attachment 1

2000 PERRY PLANT EVALUATED EXERCISE OBJECTIVES

<u>AFFECTED AREA</u>	<u>ITEM NO.</u>	<u>OBJECTIVE</u>
Group B Objectives:		ERO NOTIFICATIONS/RESPONSE
CR, TSC SAS	B.1	Demonstrate ability to notify on-call ERO personnel in a timely manner upon (re)classification of an emergency event.
TSC, OSC EOF, PIRT JPIC	B.2	Demonstrate ability to adequately staff and activate facilities promptly in support of postulated emergency conditions.
TSC, OSC	B.3	Demonstrate ability to augment staffing in support of postulated emergency conditions.
CR, TSC EOF	B.4	Demonstrate ability to effectively direct the activation of emergency facilities in a timely manner when required by procedure or warranted based on postulated events.
EOF, TSC	B.9	Demonstrate the ability to coordinate with and support NRC regional site team activities.
Group C Objectives:		OFFSITE NOTIFICATIONS
CR, TSC, EOF	C.1	Demonstrate ability to notify the State of Ohio and local counties within 15 minutes of initially declaring and reclassifying an emergency event.
CR, TSC, EOF	C.2	Demonstrate ability to notify the NRC within one hour of initially declaring or reclassifying an emergency event.
CR, TSC, EOF	C.3	Demonstrate ability to periodically update Federal, State and local county officials, and agencies on the status of emergency based on available information.
CR, TSC, EOF	C.4	Demonstrate ability to maintain an open line over the ENS and "5-way" circuits and respond to inquiries promptly.
		<u>Limiting Condition:</u> "5-Way" Circuit or alternate methods will be used to contact actual State and local county points of contact. A phone cell will be used to simulate communications and interactions with the NRC.
CR, TSC EOF	C.6	Demonstrate ability to effectively transfer responsibility for ENS and "5-way" circuits between facilities.

2000 PERRY PLANT EVALUATED EXERCISE OBJECTIVES

<u>AFFECTED AREA</u>	<u>ITEM NO.</u>	<u>OBJECTIVE</u>
Group C Objectives: TSC, EOF	C.7	OFFSITE NOTIFICATIONS (Cont'd.) Demonstrate ability to notify and periodically update utility support organizations (e.g., INPO, NEIL) as required.
		<u>Limiting Conditions:</u>
		1. No specific timeframe is established at the Alert classification for the notification of NEIL and INPO. Therefore, initial contact with these organizations is expected to be turned over to the TSC from the Control Room Simulator.
		2. Actual calls will be placed to the INPO Incident Response Center. However, notifications to NEIL will be via a control cell with telephone numbers pre-established with participants as an initial condition.
EOF	C.8	Demonstrate mechanism for recommending protective actions to State and local county authorities.
Group D Objectives:		EMERGENCY COMMUNICATIONS
CR, TSC OSC, EOF PIRT, JPIC	D.1	Demonstrate ability to communicate clearly and effectively between onsite facilities.
CR, SAS OSC	D.2	Demonstrate ability to communicate clearly and effectively with shift and OSC repair/assessment team personnel dispatched in-plant.
TSC, EOF	D.3	Demonstrate ability to communicate clearly and effectively with Radiation Monitoring Teams (RMTs).
CR, CAS	D.4	Demonstrate ability to effectively warn or advise Plant personnel or individuals onsite or in adjacent areas controlled by CEI utilizing the Plant Public Address (PA), and Exclusion Area Page Systems.
CR, TSC EOF	D.6	Demonstrate ability to keep Corporate management informed of the emergency status and coordinate Corporate support.
		<u>Limiting Condition:</u> Corporate response activities will be limited to notifications of plant status and requests for Corporate support.

2000 PERRY PLANT EVALUATED EXERCISE OBJECTIVES

<u>AFFECTED AREA</u>	<u>ITEM NO.</u>	<u>OBJECTIVE</u>
Group E Objectives: COMMAND AND CONTROL		
CR	E.1	Demonstrate ability of Shift Supervisor to promptly assume and carry out duties of the Emergency Coordinator upon the initial classification of an emergency event.
CR, TSC EOF	E.2	Demonstrate effective and orderly transfer of Emergency Coordinator duties between facilities.
CR, OSC, TSC, EOF	E.3	Demonstrate ability of key ERO personnel to coordinate, emergency assessment and response activities.
CR, TSC	E.4	Demonstrate ability to establish/revise in-plant ERO priorities and effectively utilize ERO personnel to address priorities.
CR, TSC, OSC, EOF PIRT, JPIC	E.5	Demonstrate ability to effectively coordinate facility activities and to update facility staff on event status, priorities, and expected actions.
OSC	E.6	Demonstrate ability to coordinate the assembly, effective briefing/debriefing, and timely dispatching of OSC teams.
OSC	E.7	Demonstrate ability to promptly access spare/replacement parts and deliver to OSC or in-plant repair teams. <u>Limiting Conditions:</u> No spare parts or equipment will be withdrawn from the warehouse inventory. Objective will be limited to communications with Material Handlers, searching of warehouse data bases, and delivery of simulated part to OSC or work area.
OSC, SECURITY	E.8	Demonstrate effective coordination of on-shift personnel (PPOs, Security Officers, etc.) and their integration with the ERO when mobilized.
TSC, EOF RMT	E.9	Demonstrate ability to effectively transfer dose assessment responsibility and control of RMTs between facilities.
EOF, RMT	E.10	Demonstrate ability to effectively control RMT movement in relation to the release plume.
TSC, EOF	E.11	Demonstrate ability of Plant, and State and local county governments to work effectively and in a coordinated manner as specified in the Plant Emergency Plan.

2000 PERRY PLANT EVALUATED EXERCISE OBJECTIVES

<u>AFFECTED AREA</u>	<u>ITEM NO.</u>	<u>OBJECTIVE</u>
Group F Objectives: ACCIDENT ASSESSMENT/RESPONSE		
CR	F. 1	Demonstrate timely and effective use of Plant Emergency Instructions (PEIs), Off-Normal Instructions (ONIs), and other operations procedures to respond to postulated indications, alarms and reports. <u>Limiting Conditions:</u> The exercise scenario was developed based on an anticipated operator response in accordance with plant procedures. Deviations from postulated response actions will be allowed by the controller organization if this action does not prevent the demonstration of objectives. The purpose of the exercise is not to evaluate the adequacy of license operator training. Any concerns or questions regarding operator response to a postulated scenario event or casualty will be referred to Operations Training Unit (OTU) for resolution.
CR, TSC	F.2	Demonstrate ability of the ERO to assess postulated equipment or component failures in a timely manner and effectively develop corrective actions to mitigate events.
TSC, EOF	F.3	Demonstrate ability to identify the source of an actual or potential radiological release and postulated magnitude based on plant system parameters and effluent monitors.
TSC, EOF RMT	F.5	Demonstrate ability to mobilize and deploy RMTs in a timely manner.
RMT	F.6	Demonstrate appropriate equipment and procedures for determining ambient radiation levels.
RMT	F.7	Demonstrate appropriate equipment and procedures for measuring airborne radioactive concentrations as low as 10^{-7} $\mu\text{Ci/cc}$ under field conditions in the presence of noble gases.
EOF	F.8	Demonstrate ability to project exposures based on plant effluent monitor readings and field data for various meteorological conditions.
EOF	F.9	Demonstrate ability to determine appropriate protective action recommendations for the general public based on NUREG-0654, Appendix 1 and EPA Protective Action Guidelines (PAGs).
EOF	F.10	Demonstrate ability for determining the source term for releases of radiological material within plant systems (i.e. relationship between containment radiation monitor readings and radioactive material available for release from containment).
EOF, RMT	F.12	Demonstrate ability to effectively track airborne radioactive plume using RMTs.
CR, TSC, OSC, EOF	F.16	Demonstrate onsite capability and resources to provide initial values and continuing assessment throughout the course of an accident, to include: <ul style="list-style-type: none"> • Post Accident Sampling capability • Radiation and effluent monitors • In-plant radiation monitoring instrumentation • Containment radiation monitoring

2000 PERRY PLANT EVALUATED EXERCISE OBJECTIVES

<u>AFFECTED AREA</u>	<u>ITEM NO.</u>	<u>OBJECTIVE</u>
Group G Objectives:		FACILITIES AND EQUIPMENT
CR, TSC, OSC, EOF,	G.1	Demonstrate effective operation and adequacy of facilities in the assessment and mitigation of a postulated emergency event.
CR, TSC OSC, EOF, PIRT, JPIC	G.2	Demonstrate ability of key ERO personnel to perform the staffing responsibilities outlined in Table 8-1 of the Emergency Plan for the event postulated.
CR, TSC, OSC, EOF, PIRT, JPIC	G.5	Demonstrate ability of facility staff to update/maintain status boards and other displays in an accurate and timely manner.
CR, TSC, EOF	G.6	Demonstrate ability of ERO staff to effectively use the Integrated Computer System (ICS) to monitor and assess plant conditions.
TSC, EOF	G.9	Demonstrate ability of TSC and EOF staff to place facility HVAC in emergency isolation mode.
TSC, EOF	G.10	Demonstrate ability of the TSC and EOF HVAC systems to adequately maintain facility temperature control within established limits.
ALL	G.11	Demonstrate availability of equipment (including dosimetry and sampling devices) to effectively support facility operations, OSC teams, and RMTs.
Group H Objectives:		ACCOUNTABILITY
SECURITY	H.1	Demonstrate ability to account for all individuals within the Protected Area upon initiation of personnel accountability by ascertaining the names of missing individuals within 30 minutes and accounting for Protected Area personnel continuously thereafter. <u>Limiting Condition:</u> Personnel accountability will be demonstrated through the temporary evacuation of non-essential personnel from the Protected Area. Access back into the Protected Area will be allowed once accountability is accomplished. Personnel required to support plant operation or exercise control and evaluation activities will be exempted from accountability. Exempted personnel will be identified to Site Protection prior to the exercise.
SECURITY	H.6	Demonstrate ability to radiologically monitor individuals evacuating the Protected Area.

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2000 PERRY PLANT EVALUATED EXERCISE OBJECTIVES

<u>AFFECTED AREA</u>	<u>ITEM NO.</u>	<u>OBJECTIVE</u>
Group I Objectives:		EXPOSURE CONTROL
OSC	I.1	Demonstrate ability to effectively monitor and control emergency worker exposures per Plant procedures.
OSC, TSC, EOF	I.3	Demonstrate ability to assign personal dosimetry, effectively monitor exposure at appropriate frequencies, and maintain accurate dose records for Plant emergency workers. <u>Limiting Condition:</u> Issuance of dosimetry to OSC staff at a Site Area Emergency per EPI-B11, OSC staff will be issued a TLD and low range dosimeter upon declaration of a Site Area Emergency. However, OSC staff requiring RRA access will continue to follow normal plant dosimetry requirements.
OSC, HP	I.4	Demonstrate adequate equipment and procedures for decontamination of Plant emergency workers and equipment, and for waste disposal.
HP	I.5	Demonstrate onsite contamination control measures, including area access control, drinking water and food supplies, and criteria for permitting return of areas and items to normal use.
Group J Objectives:		MEDICAL RESPONSE
FAT	J.1	Demonstrate ability of onsite first aid responders to effectively assess a medical emergency and render appropriate medical care within their training in a timely manner.
FAT, HP	J.2	Demonstrate adequacy of health physics support in determining the radiological status of a victim and advising first aid responders on radiological concerns.
FAT	J.3	Demonstrate adequacy of facilities and equipment to support first aid responders.
FAT, SAS	J.4	Demonstrate ability to promptly notify and request offsite ambulance support for transportation of a victim.
SECURITY, FAT	J.5	Demonstrate organizational ability and procedures for Plant first aid responders, health physics, and security officers to effectively coordinate: ingress and egress to and from the Protected Area of an offsite ambulance; dress-out and radiological monitoring of the ambulance and crew, and transfer of a victim. <u>Limiting Conditions:</u> Postulated injury will not justify ambulance crew access into the plant RRA. Therefore, transfer of victim from the FAT to Perry Township Fire Department will occur at the RRA Access Point.

2000 PERRY PLANT EVALUATED EXERCISE OBJECTIVES

<u>AFFECTED AREA</u>	<u>ITEM NO.</u>	<u>OBJECTIVE</u>
Group J Objectives: MEDICAL RESPONSE (Cont'd.)		
SAS	J.6	Demonstrate ability to notify and coordinate with a local medical facility for the care, handling and treatment of a contaminated and injured victim. <u>Limiting Condition:</u> Objective is limited to the notification of Lake East Hospital in Painesville, OH. Interface of plant Health Physics support with hospital staff will be evaluated under Lake County objectives per FEMA-REP-15.
Group K Objectives: PUBLIC INFORMATION/RUMOR CONTROL		
JPIC	K.1	Demonstrate points of contact and physical locations for use by news media during an emergency.
JPIC	K.3	Demonstrate organizational ability and procedures to designate a spokesperson having access to necessary information, and arrange for a timely exchange of information among designated spokespersons.
JPIC	K.4	Demonstrate ability to brief media representatives in a clear, accurate and timely manner.
JPIC	K.5	Demonstrate ability to monitor the media to detect and correct errors.
PIRT, JPIC	K.6	Demonstrate ability of Company telephone attendants and personnel to reroute incoming inquiries regarding the emergency to the PIRT/JPIC. <u>Limiting Condition:</u> This objective is met by a controller calling directly into an ERO Facility and being directed to an appropriate facility/personnel.
JPIC	K.7	Demonstrate ability to establish and operate rumor control in a coordinated fashion.
PIRT, JPIC	K.8	Demonstrate ability of the PIRT/JPIC to disseminate information to Company employees.
Group L Objectives: RECOVERY		
TSC, EOF	L.2	Demonstrate ability to formulate a Recovery Plan and identify a Recovery Organization. <u>Limiting Condition:</u> No additional callouts, with the exception of the Recovery Director and Plant Recovery Manager, will be made to support Recovery discussions. ERO personnel staffing the TSC and EOF during the Emergency Phase will be integrated into a Recovery Organization to assist in the development of a preliminary Recovery Plan.
EOF	L.3	Demonstrate ability to establish a method of periodically updating State and local county officials on plant recovery activities.

END OF LISTING